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Attorney for Defendant
BRYAN PAUL TAMBLYN

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	Case No. 2:20-cr-00014-KJM
)	
Plaintiff,)	STIPULATION FOR TEMPORARY
)	MODIFICATION OF CONDITIONS OF PRETRIAL
vs.)	RELEASE; ORDER
)	
BRYAN PAUL TAMBLYN,)	Hon. Edmund F. Brennan
)	
Defendant.)	
)	
)	

The defendant, BRYAN PAUL TAMBLYN, by and through his attorney of record, Assistant Federal Defender Megan T. Hopkins, and the UNITED STATES, by and through its attorney of record, Christina McCall, hereby stipulate to and request an order from this Court temporarily modifying the conditions of Mr. Tamblyn's pretrial release to permit him to attend a family gathering at his mother's home in Granite Bay, CA, to celebrate Mr. Tamblyn's birthday. The parties have conferred with Mr. Tamblyn's assigned pretrial services officer, who approves of this stipulated modification.

Mr. Tamblyn is currently on pretrial release in this district on a \$50,000 unsecured appearance bond, as well as an appearance bond secured by deeds of trust and co-signed by his uncle, Jerome Espinosa and grandfather, Richard Espinosa. *See* Dkt. 26 (unsecured appearance bond) and Dkt. 29 (appearance bond secured by deeds of trust). Additionally, Mr. Tamblyn has three (3) appointed third party custodians: Richard Espinosa, Sr., Jerome Espinosa, and Sheri Placencia.

1 Mr. Tamblyn is in compliance with his conditions of release. One of those conditions of
2 release is location monitoring. Mr. Tamblyn is subject to home detention, and therefore must
3 remain inside his residence at all times except for employment; education; religious services;
4 medical, substance abuse, or mental health treatment; attorney visits; court appearances; court
5 ordered obligations; or other activities pre-approved by the pretrial services officer¹.

6 Mr. Tamblyn requests, and the parties agree and so stipulate, that his Conditions of
7 Release be temporarily amended to specifically permit him to attend a family gathering in the
8 backyard of his mother's home in Granite Bay, CA. Mr. Tamblyn's mother is hosting a birthday
9 celebration from 12:00 p.m. – 8:00 p.m. with Mr. Tamblyn's parents, siblings, aunts and uncles,
10 nieces and nephews. Any minors in attendance will be accompanied by their parents, whose
11 names and contact information have been provided to the pretrial services officer. The
12 celebration will include socially distant visiting, lunch and dinner, and cake.

13 Granite Bay, CA is just under 40 miles from Mr. Tamblyn's home in Elk Grove, CA, and
14 the estimated drive time ranges from 45 minutes to an hour². Allowing some additional time for
15 traffic and the time set aside for the birthday celebration, the parties request a temporary
16 modification of pretrial conditions to permit Mr. Tamblyn's release from the monitor between
17 11:30 a.m. and 9:30 p.m. on Sunday, November 8, 2020. Mr. Tamblyn will be in the company
18 of two third party custodians and multiple sureties at the birthday party, and will not absent
19 himself from his Mother's home during the celebration. Mr. Tamblyn will drive directly to his
20 mother's home from his residence and will immediately return to his residence at the conclusion
21 of the gathering and a brief time to assist his mother with cleanup.

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26
27 ¹ Pretrial services interprets this condition to only permit their approval of other activities which are deemed
28 "essential," with all other activities requiring the approval of the Court. The pretrial services officer who supervises
Mr. Tamblyn advised defense counsel that this specific request should be submitted to the Court for approval, in the
form of a stipulation by the parties.

² According to a search on google maps, estimating distance between Elk Grove, CA and Granite Bay, CA.

The proposed temporarily amended condition is attached to this request. The parties do not request a hearing in this matter in light of this stipulation.

Respectfully submitted,

DATED: November 4, 2020

HEATHER E. WILLIAMS
Federal Defender

/s/ Megan T. Hopkins

MEGAN T. HOPKINS

Assistant Federal Defender

Attorney for BRYAN PAUL TAMBLYN

DATED: November 4, 2020

MCGREGOR SCOTT
United States Attorney

/s/ Christina McCall

CHRISTINA MCCALL

Assistant United States Attorney


Attorney for the United States

ORDER

GOOD CAUSE HAVING BEEN SHOWN, IT IS HEREBY ORDERED THAT the Special Conditions of Release for defendant, Bryan Paul Tamblyn, be Temporarily Amended such that he is permitted to attend a family gathering in celebration of his birthday at his mother's home in Granite Bay, CA between the hours of 11:30 a.m. and 9:30 p.m. on Sunday, November 8, 2020. Mr. Tamblyn shall travel directly to and from the event and shall be in the presence of a third party custodian for the entire time he is at the gathering. Mr. Tamblyn shall not be in the presence of any juveniles or minors unless that juvenile or minor's parent or guardian is also present. All other conditions of pretrial release shall remain in force.

The Temporary Amended Special Condition of Release is hereby adopted.

Dated: November 6, 2020


KENDALL J. NEWMAN
UNITED STATES MAGISTRATE JUDGE